

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

**UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,**

*

Plaintiff

*

v.

*

Civil Action No. S 00 CV 2918

WILLIAM F. MAHON, et al.,

*

Judge William D. Quarles

Defendants

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* * * * *

**MOTION OF RELIEF DEFENDANTS SEAN AND DEREK JUPITER
TO STAY PROCEEDINGS**

Sean and Derek Jupiter, Relief Defendants (the “Relief Defendants”), by their attorneys, pursuant to 50 App. U.S.C.A. § 522, move for entry of an Order staying these proceedings as to them. The grounds in support of this motion are as follows:

1. These Relief Defendants are in the active service of the United States Military. Sean Jupiter is in the United States Air Force; he is currently stationed at Travis Air Force Base, San Francisco, California. His military commitment is four and ½ years. Dean Jupiter is in the United States Marine Corps; he is currently stationed at Cherry Point, N.C. His military commitment is sixteen months. He is subject to deployment to Iraq at any time. The military duties of these Relief Defendants materially affect their ability to appear and assist in their defense of this Action.

2. Counsel has been unable to obtain the letters or other communications described in 50 App. U.S.C.A. § 522 (b) (2) (A) and (B). Counsel will continue to attempt to obtain these, but in the interim a stay is needed.

3. The SEC has filed a Motion for Disgorgement and Repatriation Orders Against these Relief Defendants. A stay of the action to give these Relief Defendants an opportunity to oppose this Motion is requested.

3. Relief Defendants request a stay of these proceedings as to them for the period of their military service and 90 days thereafter. 50 App. U.S.C.A. § 525 (a).

4. Pursuant to Local Rule 105.9, Relief Defendants attempted to obtain the consent of Carolann Gemski, attorney for the SEC, but counsel is unable to consent to the requested stay pending the review of documentation supporting the requested stay.

WHEREFORE, Relief Defendants, Sean and Derek Jupiter, request that the Court enter an Order staying these proceedings as to them for the period of their military service and 90 days thereafter.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of June, 2005, a copy of the foregoing Motion of Relief Defendants Sean and Derek Jupiter to Stay Proceedings has been filed electronically pursuant to Fed. R. Civ. P. 5 (b) (2) (D) and that Notice of this filing will be sent electronically to Carolann Gemski, Esquire, attorney for Plaintiff, Unites States Securities and Exchange Commission, 175 West Jackson Boulevard, Suite 900, Chicago, Illinois, 60604 and to Allan M. Lerner, Esquire, 2888 East Oakland Park Boulevard, Fort Lauderdale Florida 33306.

_____/s/
Paul M. Vettori